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PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-PP)

29 AUG 2012

Memorandum

To: Superintendent, Lake Mead National Recreation Area

From: **ACTING** Regional Director, Pacific West Region

Subject: Environmental Compliance for Lake Mead Lodge Discontinuance

The *Finding of No Significant Impact* for discontinuance of Lake Mead Lodge (pursuant to MOU signed with Nevada SHPO on August 2, 2012) and the subsequent restoration of the site is approved. As previously arranged, by transmittal of copy of the signed decision we will inform the Solicitor's Office of the park's achievement of this milestone.

To complete this particular compliance effort, at the time when the decision is announced the park should make the attached document available to all individuals, organizations, and agencies that received or consulted on the supporting environmental assessment.


for Christine S. Lehnertz

cc w\atch:
SOL-Lown
PWR-CM;CR

FINDING OF NO SIGNIFICANT IMPACT

Lake Mead Lodge Discontinuation and Adaptive Re-use Study Environmental Assessment

August 2012

Lake Mead National Recreation Area
Clark County, Nevada

BACKGROUND

Lake Mead Lodge, originally called Hualapai Lodge, was built in 1941 by NPS concessioner Grand Canyon Boulder Dam Tours, Inc. and played a significant role in the early development of commercial operations and tourism in the park, offering the first overnight accommodations on Lake Mead. The National Park Service (NPS) decided in 2007 to discontinue commercial services at this location because providing commercial overnight accommodations to park visitors was determined to be no longer necessary and appropriate, given the abundance of lodging options available in nearby communities and the NPS policy not to provide services that either are, or could be, provided by others in the local area (*Management Policies*, Section 10.2.2). Concessioner-operated visitor services at Lake Mead Lodge ceased effective as of December 31, 2008.

PURPOSE AND NEED

The Management of Lake Mead NRA must make a decision about the site's future use in order to avoid the environmental impacts and operational issues that stem from prolonged vacancy and lack of regular maintenance, sometimes referred to as benign neglect. It was initially proposed that Lake Mead Lodge would be demolished, but after a study was completed determining that the Lodge was eligible for listing on the National Register of Historic Places, the NPS began the process of formally evaluating the impacts of either demolishing the lodging complex or adaptively reusing it for non-commercial purposes. The environmental assessment (EA) analyzed the No Action alternative and five action alternatives.

SELECTED ACTION

The Selected Action is the environmentally preferred alternative, which was identified and analyzed in the EA as Alternative B. The Selected Action was identified in the EA as the Management-preferred alternative if Alternative F could not be implemented. Alternative F was feasible only if a qualified non-profit organization stepped forward with both the interest and financial capability to rehabilitate and maintain the site for a non-commercial use authorized by

the NPS. No such organization was found because rehabilitation of the site cannot be completed in a cost-effective manner, a situation unlikely to change in the future.

No changes have been incorporated into the Selected Action as a result of public comment or agency consultations. Under the Selected Action, all four buildings comprising Lake Mead Lodge will be demolished and removed from the site. All associated landscaping, parking, and entrance roads will be removed. The pool will be removed. Underground utilities will be capped and abandoned in place. The site, just over 10 acres in size, will then be restored to natural conditions to the greatest extent possible. Soil will be decompacted, and the area will be re-contoured to match the surrounding landscape and allow for natural drainage patterns. Landscaping will include seeding or planting with native species from the Park nursery to achieve species composition and density that is commensurate with the surrounding area. Rock placement will be random to match the surrounding area, and a simulated desert varnish will be applied as necessary to ensure that rock colors blend effectively.

ALTERNATIVES CONSIDERED BUT NOT SELECTED

In addition to the Selected Action (Alternative B: Demolish Lake Mead Lodge and Restore Site to Natural Condition), the EA analyzed five other alternatives:

- **Alternative A (No Action):** Under the No Action alternative, Lake Mead Lodge would be left vacant. The buildings and landscaping would not be removed, and the site would not be restored. There would be no use of the facilities by the NPS or any other parties. This alternative was rejected because it results in impacts to both natural and cultural resources while failing to provide any benefit to the park, its staff, or the public.
- **Alternative C (Rehabilitate Entire Site for NPS Use):** Under Alternative C, the entire site, including all four buildings, would be rehabilitated for administrative use by the NPS. Building rehabilitation would include structural, electrical, communication, plumbing, climate, and landscape components. Once rehabilitated, the buildings would be used for offices for NPS personnel or for NPS meeting space. This alternative was rejected because benefits to natural and visual resources are reduced relative to the Selected Action.
- **Alternative D (Mothball Annex and One Lodge Building and Rehabilitate Two Buildings for NPS Use):** Under Alternative D, the annex and the northernmost lodge building would be mothballed, while the other two lodge buildings would be rehabilitated for NPS use. The buildings retained for NPS use would undergo the same rehabilitation and would have the same re-use options as described under Alternative C. This alternative was rejected because benefits to natural and visual resources are reduced relative to the Selected Action.
- **Alternative E (Demolish Annex and One Lodge Building and Rehabilitate Two Buildings for NPS Use):** Under Alternative E, the annex and the northernmost lodge building would be demolished, while the other two lodge buildings would be rehabilitated for NPS use. The buildings retained for NPS use would undergo the same rehabilitation and would have the same re-use options as described under Alternative C.

This alternative was rejected because benefits to natural and visual resources are reduced relative to the Selected Action.

- **Alternative F (Rehabilitate Site for Non-Commercial Use by Non-Profit Organization):** Under Alternative F, the Lake Mead Lodge site would be assigned, through a cooperative agreement under 16 U.S.C. 1g for use in the public purposes of carrying out NPS programs, or through other authority authorizing the assignment of Federal facilities for non-commercial purposes, to a non-profit or governmental organization for rehabilitation and non-commercial use. Rehabilitation components would be the same as those described under Alternative C. The organization would be required to have a mission complementary to the NPS (furthering the purposes for which the park was established) as well as the financial capacity to complete the rehabilitation and cover ongoing operational and maintenance costs. Alternative F was identified in the EA as the primary Management-preferred Alternative, but no qualified organizations possessing both the interest and the financial capability to occupy the site were identified.

ALTERNATIVES CONSIDERED BUT DISMISSED

Several other options for the Lake Mead Lodge site were initially considered but ultimately dismissed from further analysis. One option was to convert the Lodge to a training center for use by the NPS and other state and federal agencies. However, this would require extensive daily housekeeping and facility upkeep along with reception and information technology staff. Such an investment would not be practical for a facility that may receive only occasional use, nor does the NPS have funding to support the additional staff and resources required to manage such a labor-intensive operation. Another option was to convert the site to housing quarters for NPS seasonal employees. This was dismissed because the workload associated with management and maintenance of additional NPS housing is not warranted since the park currently has excess housing capacity and other accommodations are available in the gateway communities.

Finally, consideration was given to demolishing the entire site and constructing new buildings to serve as NPS administrative facilities. This option was initially considered since rehabilitation of the buildings could cost as much or more than the construction of new facilities designed specifically for their intended use. However, this alternative was ultimately dismissed since it removes the historic element of the site entirely and because all new construction should follow the park's approved master plan, which is intended to consolidate operations and does not allow the locating of administrative facilities in such a heavily used visitor area.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is the alternative that will promote the National Environmental Policy Act (NEPA), as expressed in Section 101 of NEPA, and includes elements that:

- 1) Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;

- 2) Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- 3) Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable or unintended consequences;
- 4) Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- 5) Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and,
- 6) Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

According to the NPS NEPA Handbook (*Director's Order #12*), through identification of the environmentally preferred alternative, the NPS decision-makers and the public are clearly faced with the relative merits of choices and must clearly state through the decision-making process the values and policies used in reaching final decisions.

No alternative completely satisfies all six criteria listed above. As indicated in the EA, the Selected Action is the environmentally preferable alternative because overall it best meets the requirements in Section 101 of NEPA. By providing for complete restoration of the site to a natural condition, Alternative B results in the greatest beneficial effect to geology and soils, biological resources, and visual resources and satisfies criteria 1, 2, 3, and 6 above. Although Alternatives C and F offer greater potential to preserve a historic resource (criterion 4 above), benefits to the physical and natural environment resulting from site restoration are reduced under these alternatives. Alternatives D and E do not effectively preserve the historic resource and offer reduced natural resource and visual benefits relative to Alternative B. The No Action alternative results in impacts to both natural and cultural resources while failing to provide any benefit to the park, its staff, or the public.

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MITIGATION AND MONITORING

Mitigation measures are specific actions designed to minimize, reduce, or eliminate impacts of alternatives and to protect Lake Mead NRA resources and visitors. The following table outlines mitigation measures that will be implemented under the Selected Action.

Resource Area	Mitigation Measure	Responsible Party
Geology and Soils	Dust abatement measures will be implemented prior to demolition or other ground-disturbing activities.	Contractor
	A stormwater pollution prevention plan will be developed and implemented to prevent erosion impacts during demolition and restoration activities.	Contractor
Biological Resources	Native plants or their seed, cultivated from the local area, will be used in all revegetation activities.	Park Vegetation Managers
	All equipment will be cleaned prior to working on site to avoid the introduction or spread of non-native vegetation in the project area.	Contractor (w/ Park oversight)
	Pre-demolition surveys will be conducted to ensure that demolition activities do not harm roosting bats or nesting birds.	Park Biologists
Cultural Resources	A wayside exhibit will be installed along the River Mountains Loop Trail discussing the history of Lake Mead Lodge.	Park Archaeologist
	A web page will be developed for the park's website, which will provide a history of the Lodge including its ties to local communities and its role in the park's development. Other documents pertaining to the Lodge will be linked to the web page.	Park Archaeologist
	Historic information and other documentation related to the project will be archived in the park's curation facility.	Park Archaeologist

WHY THE SELECTED ACTION WILL NOT HAVE A SIGNIFICANT IMPACT ON THE HUMAN ENVIRONMENT

The NPS used the NEPA criteria to evaluate whether the selected action will have a significant impact on the environment. As defined by 40 CFR 1508.27, significance is determined by examining the following criteria:

- 1. Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts which require analysis in an environmental impact statement:** The Selected Action results in beneficial effects to all impact topics except Cultural Resources. No significant adverse impacts were identified that will require further analysis in an environmental impact statement.
- 2. The degree to which public health and safety are affected:** The Selected Action has no adverse effect on public health or safety. Located in the busy Boulder Beach area, the abandoned lodge is an attractive nuisance, and its removal will prevent trespass that could result in accidents or injuries to visitors.
- 3. Any unique characteristics of the area such as proximity to historic or cultural resources, wild and scenic rivers, ecologically critical areas, wetlands or floodplains:** No wild and scenic rivers, ecologically critical areas, wetlands or floodplains are located within the project area. Impacts to cultural resources are discussed in No. 8 below.
- 4. The degree to which impacts are likely to be highly controversial:** There were no highly controversial impacts identified during preparation of the EA or during the public review period. Comments were received favoring adaptive re-use over demolition. While originally supportive of this option, the NPS determined through careful analysis that it was not feasible to implement.
- 5. The degree to which the potential impacts are highly uncertain or involve unique or unknown risks:** No highly uncertain, unique, or unknown risks were identified during the preparation of the EA or during the public review period.
- 6. Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration:** No significant adverse impacts were identified during preparation of the EA. Implementation of the Selected Action neither establishes a NPS precedent for future actions with significant effects, nor represents a decision in principle about a future consideration.
- 7. Whether the action is related to other actions that may have individual insignificant impacts but cumulatively significant effects:** The EA analyzed impacts related to geology and soils, biological resources, cultural resources, visual resources, park operations, and safety and visitor use and experience. Effects of the Selected Action are largely beneficial, and the adverse effects to cultural resources will be mitigated through the terms of the memorandum of agreement with the Nevada State Historic Preservation Office (SHPO). There are no cumulatively significant adverse effects of the Selected Action.

8. The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources: Lake Mead Lodge is not considered nationally significant. However, the Selected Action constitutes an adverse impact to a historic property which has been determined eligible for listing in the National Register of Historic Places. The property has been documented according to the standards of the Historic American Building Survey, and mitigation has been identified in consultation with the Nevada SHPO to ensure that the cultural significance of Lake Mead Lodge is preserved. By virtue of the stipulations listed in the memorandum of agreement developed in close cooperation with the SHPO, the severity of the effects has been reduced to the greatest extent possible.

9. The degree to which an action may adversely affect an endangered or threatened species or its habitat: Implementation of the Selected Action will not adversely affect endangered or threatened species or their habitat.

10. Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment: The Selected Action violates no federal, state, or local environmental protection laws. The EA for Lake Mead Lodge Discontinuation and Adaptive Re-Use was prepared using the guidelines detailed in *NPS Management Policies 2006* and *Director's Order #12*, and the Selected Action meets all NPS requirements.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Scoping

A 30-day public scoping period occurred from October 29 to November 30, 2010. A scoping press release was sent to area media and was also posted on the Lake Mead NRA internet website and on the NPS Planning, Environment, and Public Comment (PEPC) internet website. The scoping period was advertised in the Las Vegas Sun Home News. Five comments were received, generally opposing demolition and suggesting various options for adaptive re-use.

Agency Consultation

The National Park Service consulted with the Nevada SHPO on the Selected Action. The Advisory Council on Historic Preservation was notified of the Park's adverse effect determination but chose not to participate in the consultation. A memorandum of agreement between the NPS and the SHPO was signed on August 2, 2012. Requirements for mitigating the adverse effects to a historic property are described in this agreement and summarized in the table above.

Public Review and Comments

On April 25, 2011 a press release announcing a 30-day public review period for the environmental assessment was sent to television stations, newspapers, magazines, and radio stations in Las Vegas, Henderson, Boulder City, Pahrump, Overton, Logandale, Laughlin, Nevada; Meadview, Kingman, Phoenix, and Bullhead City, Arizona; and Needles and Los Angeles, CA. The press release was also posted in the lobby of Lake Mead's headquarters

office. Additional notification was published on the Lake Mead NRA website and on the PEPC website.

Lake Mead NRA's mailing list is comprised of 244 entities including federal, state, and local agencies, tribes, individuals, businesses, libraries, and organizations. The environmental assessment was distributed to 50 individuals, agencies, and organizations likely to have an interest in this project. Entities on the park mailing list that did not receive a copy of the environmental assessment received a letter notifying them of its availability and methods of accessing the document.

The environmental assessment was published on the Lake Mead NRA website at (<http://www.nps.gov/lake>) and on the NPS PEPC website at <http://parkplanning.nps.gov/>. Copies of the environmental assessment were available at area libraries, including: Boulder City Library, Clark County Community College (North Las Vegas), Clark County Library, Las Vegas Public Library, Green Valley Library (Henderson), James I. Gibson Library (Henderson), Sahara West Library (Las Vegas), Mohave County Library (Kingman, AZ), Sunrise Public Library (Las Vegas), University of Arizona Library (Tucson, AZ), University of Nevada Las Vegas James R. Dickinson Library, Meadview Community Library, Moapa Valley Library (Overton, NV), Mesquite Library, Mohave County Library (Lake Havasu City, AZ), Laughlin Library, Searchlight Library, and Washington County Library (St. George, UT).

Public comments were accepted through May 27, 2011. Four comments were received. The Preservation Association of Clark County, the City of Henderson Community Development Department, and the non-profit environmental education organization NatureBridge all supported the NPS attempt to find a partner to adaptively re-use the site. The NPS actively sought such partners, and NatureBridge showed preliminary interest, but ultimately the site proved unsuitable for re-use. The Nevada Department of Wildlife offered suggestions for minimizing impacts to wildlife during demolition activities, and these have been incorporated into the mitigation measures described above.

IMPAIRMENT OF PARK RESOURCES OR VALUES

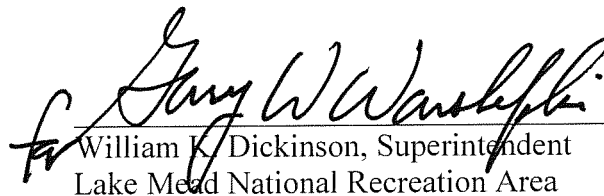
The implementation of the selected action will not constitute an impairment of Lake Mead NRA resources or values. Impacts documented in the EA and summarized above will not affect resources or values key to the natural and cultural integrity of the Lake Mead NRA, or alter opportunities for the enjoyment of the Lake Mead NRA. The Selected Action will not impair Lake Mead NRA resources and will not violate the National Park Service Organic Act. This conclusion is based on a thorough analysis of the impacts described in the EA, and the professional judgment of the decision maker, in accordance with *NPS Management Policies 2006*. As described in the EA, implementation of the selected action will not result in major adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of Lake Mead NRA, (2) key to the natural or cultural integrity of Lake Mead NRA, or (3) identified as a goal in Lake Mead NRA's *General Management Plan* or other relevant NPS planning documents.

CONCLUSION

Based on the analysis completed in the EA, the capability of the mitigation measures to reduce, avoid, or eliminate impacts, and with due consideration of public response and agency coordination, including consultation with the Nevada SHPO, the National Park Service has determined that the Selected Action does not constitute a major federal undertaking that will significantly affect the quality of the human environment.

Negative environmental impacts that could occur are minor to moderate in effect. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, known ethnographic resources, or other unique characteristics of the region. There are no unmitigated significant impacts to the affected environment. There are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence identified. Implementation of the Selected Action would not violate any federal, state, or local environmental protection law. Therefore, in accordance with the National Environmental Policy Act of 1969, and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared for this project, and the Selected Action may be implemented as soon as practicable.

Recommended:


William K. Dickinson, Superintendent
Lake Mead National Recreation Area

8/27/12
Date

Approved:


Christine Lehnertz, Regional Director
Pacific West Region

8/29/12
Date